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Attorneys for Music Tribe Commercial NV Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHANE SIPE, an individual

Plaintiff,

v.

MUSIC GROUP OF LAS VEGAS, LLC d/b/a
MUSIC TRIBE; DOES I through X, inclusive;
ROE CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:20-cv-00299-JCM-BNW

**STIPULATION AND ORDER TO EXTEND DEADLINE FOR
DEFENDANT'S REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGEMENT
(FIRST REQUEST)**

Pursuant to NRCP 6(b)(1)(A), Defendant Music Tribe Commercial NV Inc. ("Defendant"), and Plaintiff Shane Sipe ("Plaintiff"), by and through their undersigned counsel, hereby stipulate and agree to an extension of time, up to and including Monday March 15, 2021, for Defendant to file its Reply for Motion for Summary Judgement filed December 17, 2020. This is the Defendant's first request for an extension of the deadline for Defendant's Reply for Motion for Summary Judgement. The deadline for Defendant's Reply for Summary Judgement has not yet expired.

Defendant's Motion for Summary Judgment was filed December 17, 2020. The Parties filed a Stipulation and Order to Extend Time for Plaintiff to Respond to Defendant's Motion for Summary Judgement (First request) on December 22, 2020, which was granted on December 28, 2020. On January 13, 2021, Plaintiff filed a second request for extension of time to respond to Defendant's Motion for Summary Judgment, which was granted on January 22, 2021. On February 4, 2021,

Plaintiff filed a third request for stipulation for extension of time, which was granted on February 5, 2021. On February 15, 2021, Plaintiff filed a fourth request for extension of time to respond to Defendant's Motion for Summary Judgment, which was granted on February 17, 2021. Plaintiff having filed its Opposition to Defendant Music Tribe Commercial NV Inc's Motion for Summary Judgment on February 15, 2021 therefore Defendant's Reply brief is due on March 1, 2021. Due to the involved nature of the issues set forth in the Parties' briefs, and delays caused by recent illness of Defendant's counsel, Defendant requests additional time to prepare and file a Reply brief. Plaintiff's counsel has stipulated to an extension of the deadline for Defendant to prepare and file its' Reply in support of Motion for Summary Judgment.

Therefore, the parties agree an extension of time is warranted. This stipulation is not brought for the purposes of delay or any other improper purpose.

DATED this 26th day of February, 2021.

DATED this 26th day of February, 2021.

HUTCHINGS LAW GROUP, LLC

IRELAND LAW GROUP, LLC

/s/ Mark H. Hutchings

/s/ Amanda L. Ireland, Esq.

Mark H. Hutchings
552 E. Charleston Blvd.
Las Vegas, NV 89104
Attorney for Defendant

Amanda L. Ireland, Esq.
7854 West Sahara Ave.
Las Vegas, NV 89117
Attorney for Plaintiff

IT IS SO ORDERED

Dated March 1, 2021.


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I am employed in the County of Clark, State of Nevada. I am over the age of 18 and not a party to the within action. My business address is 552 E. Charleston Blvd., Las Vegas, NV 89104.

On the date set forth below, I served the document(s) described as:

**1. STIPULATION AND ORDER TO EXTEND TIME FOR FILING REPLY ON
DEFENDANT MOTION FOR SUMMARY JUDGMENT**

on the person(s) listed below:

Amanda L. Ireland, Esq.
IRELAND LAW GROUP, LLC
7854 West Sahara Ave.
Las Vegas, NV 89117
Attorneys for plaintiff Shane Sipe

X (BY ELECTRONIC SERVICE) Pursuant to Local Rule IC 4-1 of the United States District Court for the District of Nevada, I caused the document(s) described above to be transmitted electronically to the addressee(s) as set forth above.

X (FEDERAL) I declare that I am employed in the office of an attorney admitted to practice in this Court at whose direction the service was made.

Dated: February 26, 2021

/s/ Helen Buenrostro
An employee of HUTCHINGS LAW GROUP

HUTCHINGS LAW GROUP, LLC

552 E. CHARLESTON BLVD.
LAS VEGAS, NV 89104

From: [Ireland, Amanda](#)
To: [Helen Buenrostro](#)
Cc: [Mark Hutchings](#)
Subject: Re: Sipe v Music Tribe
Date: Friday, February 26, 2021 3:35:31 PM

Absolutely, that is fine. You can go ahead and affix my electronic signature.

Amanda L. Ireland, Esq.

Ireland Law Group

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Las Vegas, NV 89117

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On Fri, Feb 26, 2021 at 6:20 PM Helen Buenrostro <helen@hutchingslawgroup.com> wrote:

Hello Ms. Ireland,

Hope this email finds you well. Attached please find our SAO to extend the time for our Reply to MSJ. Please let me know if we can affix your electronic signature. We wish to have this filed today.

Thank you,

Helen Buenrostro

Paralegal

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Our offices are currently closed to the public until further notice. You may still contact us during our normal business hours (9:00 am ~ 5:00 pm) via email and phone. We apologize for any inconvenience, and we thank you for understanding.